

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

LESTER LEE,

PLAINTIFF

v.

**BROOKSIDE PARK CONDOMINIUM,
INC., METROPOLIS (aka MCM, INC.),
RAMMY AZOULAY AND LAMONT
SAVOY**

DEFENDANTS

Case No. 8:24-cv-01205-TJS

**DEFENDANTS BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka
MCM, INC.), AND RAMMY AZOULAY'S ANSWER TO PLAINTIFF'S COMPLAINT**

Defendants **BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka
MCM, INC.), AND RAMMY AZOULAY** (hereinafter “BPC Defendants” or “Defendant”), by
and through undersigned counsel, hereby respectfully sets forth the following Answer to Plaintiffs’
Complaint as follows:

1. Denied.
2. Admitted.
3. Admitted.
4. Defendants are without knowledge as to the allegations of Paragraph 4 and
therefore it is denied.
5. Admitted.
6. Admitted
7. Admitted that Mr. Azoulay was the onsite manager. The remaining allegations are
denied.

8. Denied.

9. Denied.

10. Defendants are without knowledge as to the allegations of Paragraph 10 and therefore it is denied.

11. Paragraph 11 makes legal allegations; no response is required. Defendants are without knowledge as to the factual allegations of Paragraph 11 and therefore it is denied.

12. Defendants are without knowledge as to the allegations of Paragraph 12 and therefore it is denied.

13. Denied.

14. Defendants are without knowledge as to the allegations of Paragraph 12 and therefore it is denied.

15. Admitted.

16. Admitted.

17. Denied.

18. Defendants are without knowledge as to the allegations of Paragraph 18 and therefore it is denied.

19. Admitted.

20. Defendants are without knowledge as to the allegations of Paragraph 18 and therefore it is denied.

21. Defendants are without knowledge as to the allegations of Paragraph 21 and therefore it is denied.

22. Denied.

23. Denied.

24. Denied.

25. Denied.

26. Denied.

27. Denied.

28. Denied.

29. Denied.

30. Denied.

31. Denied.

32. Denied.

33. Denied.

34. Denied.

35. Denied.

36. Denied.

37. Denied.

38. Defendants are without knowledge as to the allegations of Paragraph 38 and

therefore it is denied.

39. Denied.

40. Denied.

41. Defendant is without knowledge as to the allegations of Paragraph 41 and therefore

it is denied.

42. Defendant is without knowledge as to the allegations of Paragraph 42 and therefore

it is denied.

43. Defendant is without knowledge as to the allegations of Paragraph 43 and therefore it is denied.

44. Defendant is without knowledge as to the allegations of Paragraph 44 and therefore it is denied.

45. Defendant is without knowledge as to the allegations of Paragraph 45 and therefore it is denied.

46. Defendant is without knowledge as to the allegations of Paragraph 46 and therefore it is denied.

47. Defendant is without knowledge as to the allegations of Paragraph 47 and therefore it is denied.

48. Defendant is without knowledge as to the allegations of Paragraph 48 and therefore it is denied.

49. Denied.

50. Defendant is without knowledge as to the allegations of Paragraph 50 and therefore it is denied.

51. Defendant is without knowledge as to the allegations of Paragraph 51 and therefore it is denied.

52. Defendant is without knowledge as to the allegations of Paragraph 52 and therefore it is denied.

53. Defendant is without knowledge as to the allegations of Paragraph 53 and therefore it is denied.

54. Defendant is without knowledge as to the allegations of Paragraph 54 and therefore it is denied.

55. Denied.

56. Denied.

57. Denied.

58. Denied.

59. Denied.

60. Denied.

61. Denied.

PRAYER FOR RELIEF

Denied.

Affirmative Defenses

1. Plaintiff's claim fails to state a claim upon which relief may be granted.
2. Plaintiff's claim is barred by illegality because Prince George's County ordinances prohibit the ownership of pit bulls.
3. Plaintiff's claim is or may be barred by the statute of limitations.
4. Plaintiff's claim is barred by failure to meet a condition precedent.

Respectfully submitted,

/s/Anthony D. Dwyer

Anthony D. Dwyer (415575)

ECCLESTON & WOLF, P.C.

Baltimore-Washington Law Center

7240 Parkway Drive, 4th Floor

Hanover, MD 21076-1378

(410) 752-7474 (phone)

(410) 752-0611 (fax)

E-mail: dwyer@ewva.com

Attorney for Defendants Brookside Park
Condominium, Inc., Metropolis (aka MCM,
Inc.), and Rammy Azoulay

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of June, 2024, copies of the foregoing
**DEFENDANTS BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka MCM,
INC.), AND RAMMY AZOULAY'S ANSWER TO PLAINTIFFS' COMPLAINT** were
served by first-class mail, postage prepaid to:

Richard Bruce Rosenthal, Esq.
545 E. Jericho Turnpike
Huntington Station, NY 11746
631.629.8111 (Phone
richard@thedoglawyer.com
Pro Hac Vice

/s/Anthony D. Dwyer
Anthony D. Dwyer (415575)